

1 KELLER BENVENUTTI KIM LLP

2 Tobias S. Keller (#151445)

3 (tkeller@kbbkllp.com)

4 Peter J. Benvenuti (#60566)

5 (pbenvenuti@kbbkllp.com)

6 Jane Kim (#298192)

7 (jkim@kbbkllp.com)

8 650 California Street, Suite 1900

9 San Francisco, CA 94108

10 Tel: 415 496 6723

11 Fax: 650 636 9251

12 *Attorneys for Debtors and Reorganized Debtors*

13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 **In re:**

Bankruptcy Case No. 19-30088 (DM)

17 **PG&E CORPORATION,**

Chapter 11

18 **- and -**

(Lead Case) (Jointly Administered)

19 **PACIFIC GAS AND ELECTRIC**
20 **COMPANY,**

NOTICE OF WITHDRAWAL OF
REORGANIZED DEBTORS' FORTIETH
OMNIBUS OBJECTION TO CLAIMS
(NO LIABILITY / PASSTHROUGH CLAIMS)
WITH RESPECT TO BRUCE E. KRELL
(CLAIM NO. 1077)

21 **Debtors.**

- 22 ☐ Affects PG&E Corporation
- 23 ☐ Affects Pacific Gas and Electric Company
- 24 ☒ Affects both Debtors

25 ** All papers shall be filed in the Lead Case, No.*
26 *19-30088 (DM).*

1 **PLEASE TAKE NOTICE** that on November 5, 2020, PG&E Corporation and Pacific Gas and
2 Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as reorganized pursuant to
3 the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases, filed the *Reorganized*
4 *Debtors’ Fortieth Omnibus Objection to Claims (No Liability / Passthrough Claims)* [Dkt. No. 9455]
5 (the “**Omnibus Objection**”), which, among other things, sought to disallow and expunge
6 Claim No. 1077, filed by Bruce E. Krell.

7 **PLEASE TAKE FURTHER NOTICE** that the Reorganized Debtors hereby withdraw the
8 Omnibus Objection solely with respect to Claim No. 1077, without prejudice to their right to object to
9 Claim No. 1077 in the future.

10 Dated: February 10, 2021

KELLER BENVENUTTI KIM LLP

/s/ Dara L. Silveira

Dara L. Silveira

Attorneys for Debtors and Reorganized Debtors